

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION

ANDREA RAYBURN,)	
)	
Plaintiff,)	Case No.: 13-cv-00544
)	
vs.)	PLAINTIFF'S COMPLAINT
)	AND DEMAND FOR JURY TRIAL
OXFORD LAW, LLC,)	
)	
Defendant.)	

VERIFIED COMPLAINT

ANDREA RAYBURN, ("Plaintiff"), through the undersigned counsel,
Katharina Devanney, alleges the following against OXFORD LAW, LLC,
("Defendant"):

INTRODUCTION

1. Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. 1692 et seq. (FDCPA).

JURISDICTION AND VENUE

2. Jurisdiction of this court arises pursuant to 15 U.S.C. 1692k(d), which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy."

3. Defendant conducts business in the state of Ohio, and therefore, personal jurisdiction is established.

4. Venue is proper pursuant to 28 U.S.C. 1391(b)(1).

5. Declaratory relief is available pursuant to 28 U.S.C. 2201 and 2202.

PARTIES

6. Plaintiff is a natural person residing in Westlake, OH.

7. Plaintiff is a consumer as that term is defined by 15 U.S.C. 1692a(3), and according to Defendant, Plaintiff allegedly owes a debt as that term is defined by 15 U.S.C. 1692a(5).

8. Defendant is a debt collector as that term is defined by 15 U.S.C. 1692a(6), and sought to collect a consumer debt from Plaintiff.

9. Defendant is a national company, with its corporate office located at: Oxford Law, LLC, 311 Veterans Highway, Suite 100A, Levittown, PA 19056.

10. Defendant, in the ordinary course of business, regularly, on behalf of itself or others, engages in debt collection.

FACTUAL ALLEGATIONS

11. Defendant constantly and continuously places collection calls to Plaintiff seeking and demanding payment for the alleged debt.

12. Defendant calls Plaintiff from telephone numbers (484) 866-3356, and (215) 526-2600 seeking and demanding payment for the alleged debt.

13. Defendant places telephone calls without meaningful disclosure of the caller's identity as Defendant does not state the name of its company.

14. Defendant has caused Plaintiff personal phone to ring and has engaged Plaintiff in telephone conversations repeatedly.

15. Plaintiff submitted a Cease and Desist Letter to the Defendant and thereafter the Defendant continued to call.

COUNT I
DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT

16. Defendant violated the FDCPA based on the following:

- a.) Defendant violated §1692d of the FDCPA by engaging in conduct the natural consequence of which is to harass, oppress, or abuse the Plaintiff in connection with the collection of a debt.
- b.) Defendant violated §1692d(5) of the FDCPA by causing a telephone to ring repeatedly and continuously with the intent to annoy, abuse, and harass Plaintiff.
- c.) Defendant violated §1692c(a)(1) of the FDCPA by communicating with Plaintiff at such place and time known or which should have been known to be inconvenient to Plaintiff.
- d.) Defendant violated 1692g, for failing to cease and desist telephone calls to Plaintiff after Plaintiff submitted a Cease and Desist Letter to the Defendant.

WHEREFORE, Plaintiff, ANDREA RAYBURN, respectfully requests judgment be entered against Defendant, OXFORD LAW, LLC, for the following:

- a. Declaratory judgment that Defendant's conduct violated the Fair Debt Collection Practices Act,

- b. Statutory damages pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k,
- c. Actual damages,
- d. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k
- e. Any other relief that this Honorable Court deems appropriate.

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiff, ANDREA RAYBURN, demands a jury trial in this case.

This 13th day of March, 2013.

BY: /s/ Katharina Devannev
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